



Order Filed on June 16, 2021
by Clerk
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004

McMANIMON, SCOTLAND & BAUMANN, LLC

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Trenton, New Jersey 08611

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Joseph R. Zapata, Jr.

jzapata@msbnj.com

Attorneys for Thomas J. Orr, Chapter 7 Trustee

In re:

CAROLYN E. BROWN,

Debtor.

Case No. 20-20921 (CMG)

Chapter 7

Honorable Christine M. Gravelle, U.S.B.J.

**CONSENT ORDER FOR THE TURNOVER OF FUNDS TO THE DEBTOR IN
SATISFACTION OF THE DEBTOR'S EXEMPTION UNDER 11 U.S.C. § 522(d)(1)
FROM THE PROCEEDS OF SALE OF THE DEBTOR'S REAL
PROPERTY LOCATED AT 11 OAK GLEN LANE, COLTS NECK, NJ**

The relief set forth on the following pages numbered two (2) through four (4) is hereby
ORDERED.

DATED: June 16, 2021

A handwritten signature in cursive script, reading "Christine M. Gravelle", written in black ink.

Honorable Christine M. Gravelle
United States Bankruptcy Judge

Debtor: Carolyn E. Brown
Case No. 20-20921 (CMG)
Caption of Order: Consent Order for the Turnover of Funds to the Debtor in Satisfaction of the Debtor's Exemption under 11 U.S.C. § 522(d)(1) from the Proceeds of Sale of the Debtor's Real Property Located at 11 Oak Glen Lane, Colts Neck, NJ

THIS MATTER, having been presented to the Court by Thomas J. Orr, the Chapter 7 Trustee (the “**Trustee**”) for Carolyn E. Brown, Chapter 7 debtor (“**Debtor**”), by and through his counsel, McManimon, Scotland & Baumann, LLC, on application for the entry of a Consent Order for the turnover of funds to the Debtor in satisfaction of the Debtor's exemption under 11 U.S.C. § 522(d)(1) in the real property located Oak Glen Lane, Colts Neck, NJ (the “**Property**”); and the Property having been sold by the Trustee, with net funds received in excess of the Debtor's allowed exemption of \$25,150 (the “**Homestead Exemption**”); and the Debtor having died prior to the sale of the Property; and the Trustee, Debtor's counsel and the executor of the Debtor's decedent estate having agreed to the manner of turnover of the funds to be paid on account of the Homestead Exemption, as appears from the signatures of counsel affixed hereto, it is hereby

ORDERED AS FOLLOWS:

1. The Trustee will pay the amount equal to the Homestead Exemption (\$25,150) by check payable and delivered to counsel for the Debtor's trust account. Upon receipt of this check by Debtor's counsel, the Debtor and the executor of the Debtor's decedent estate will be deemed to have waived any and all claims against the Trustee and/or the bankruptcy estate related to the payment of the Homestead Exemption.

2. The terms of this Consent Order are subject to the Court's approval and the issuance of a Notice of Settlement (the “**Notice**”) and the following:

- (a) If no objection to the Notice is filed, the issuance and docketing of a Certification of No Objection by the Clerk of the Bankruptcy Court; or

Page 3 of 4

Debtor: Carolyn E. Brown
Case No. 20-20921 (CMG)
Caption of Order: Consent Order for the Turnover of Funds to the Debtor in Satisfaction of the Debtor's
Exemption under 11 U.S.C. § 522(d)(1) from the Proceeds of Sale of the Debtor's Real
Property Located at 11 Oak Glen Lane, Colts Neck, NJ

(b) if any objection to the Notice is filed, the overruling of any such objection
by this Court.

In the event that an objection to the settlement is filed and sustained, the parties shall be restored
to their pre-settlement positions.

3. The parties, and anyone who succeeds to their rights and responsibilities
hereunder, including their successors and/or assigns, are bound by this Consent Order. This
Consent Order is made for the benefit of the parties and all who succeed to their rights and
responsibilities.

4. The Bankruptcy Court will retain exclusive jurisdiction to adjudicate all matters
arising under or in connection with this Consent Order.

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Page 4 of 4

Debtor: Carolyn E. Brown
Case No. 20-20921 (CMG)
Caption of Order: Consent Order for the Turnover of Funds to the Debtor in Satisfaction of the Debtor's
Exemption under 11 U.S.C. § 522(d)(1) from the Proceeds of Sale of the Debtor's Real
Property Located at 11 Oak Glen Lane, Colts Neck, NJ

*The undersigned hereby consent to
the form and entry of the within Order:*

**MCMANIMON SCOTLAND
& BAUMANN, LLC**
Attorneys for Thomas J. Orr, Chapter 7 Trustee

COLLINS, VELLA & CASELLO, LLC
Attorneys for Carolyn E. Brown, the Debtor

By: /s/ Joseph R. Zapata, Jr.
JOSEPH R. ZAPATA, JR., ESQ.

By: /s/ Joseph M. Casello
JOSEPH M. CASELLO, ESQ.

Dated: June 7, 2021

Dated: June 3, 2021

**DECEDENT ESTATE
OF CAROLYN E. BROWN**

By: /s/ Douglas Brown
DOUGLAS BROWN, Executor

Dated: June 4, 2021

In re:
Carolyn E. Brown
Debtor

Case No. 20-20921-CMG
Chapter 7

CERTIFICATE OF NOTICE

District/off: 0312-3
Date Rcvd: Jun 16, 2021

User: admin
Form ID: pdf903

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jun 18, 2021:

Recip ID	Recipient Name and Address
db	+ Carolyn E. Brown, 11 Oak Glen Lane, Colts Neck, NJ 07722-1612

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jun 18, 2021

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on June 16, 2021 at the address(es) listed below:

Name	Email Address
Andrea Dobin	on behalf of Trustee Thomas Orr adobin@msbnj.com
Denise E. Carlon	on behalf of Creditor QUICKEN LOANS INC. dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Donald F. Campbell, Jr.	on behalf of Creditor Air Technical Home Services LLC d/b/a Air Technical Services dcampbell@ghclaw.com 4433@notices.nextchapterbk.com
Donald F. Campbell, Jr.	on behalf of Creditor Raymond Dietrich dcampbell@ghclaw.com 4433@notices.nextchapterbk.com
Gavin Stewart	on behalf of Creditor Toyota Motor Credit Corporation bk@stewartlegalgroup.com
James P. Berg	on behalf of Creditor WBL SPO I LLC s/h/a Axios Bank james.berg@piblaw.com, Daniel.schleifstein@piblaw.com

District/off: 0312-3

User: admin

Page 2 of 2

Date Rcvd: Jun 16, 2021

Form ID: pdf903

Total Noticed: 1

James P. Berg

on behalf of Creditor World Business Lenders LLC s/h/a Axios Bank james.berg@piblaw.com, Daniel.schleifstein@piblaw.com

Joseph Casello

on behalf of Debtor Carolyn E. Brown jcasello@cvclaw.net jcasello627@gmail.com

Joseph R Zapata, Jr

on behalf of Trustee Thomas Orr jzapata@msbnj.com

Thomas Orr

tom@torrlaw.com Torr@ecf.axosfs.com

Timothy P. Neumann

on behalf of Interested Party Douglas Brown timothy.neumann25@gmail.com
btassillo@aol.com;geoff.neumann@bnfsbankruptcy.com;geoff.neumann@gmail.com

Travis Graga

on behalf of Interested Party Browns Gas Appliance and Furnace Service Inc. tgraga@kbtlaw.com
akelly@kbtlaw.com;wsheridan@kbtlaw.com;saudino@kbtlaw.com;pschenke@kbtlaw.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

William M.E. Powers

on behalf of Creditor Wells Fargo Bank N.A. ecf@powerskirn.com

William M.E. Powers, III

on behalf of Creditor Wells Fargo Bank N.A. ecf@powerskirn.com

TOTAL: 15